

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS**

Hainan Changyuan Technology Co., Ltd.,
Plaintiff,

C.A.: 1:24-cv-08087

v.

Judge Sunil R. Harjani

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,
Defendants

Magistrate Judge Sheila M. Finnegan

PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT

Plaintiff Hainan Changyuan Technology Co., Ltd. ("Hainan" or "Plaintiff"), through his counsel, moves this Honorable Court to enter Default and Default Judgment against the Defaulting Defendants (EX. 1). In support of this Motion, Plaintiff submits the following:

1. This case was filed on September 5, 2024 (DE 1).
2. On or around October 2, 2024, Defendants were served a copy of the Complaint and Summons (DE 48). Service was accomplished via email and publication (DE 24).
3. Plaintiff is serving this Motion via email to the Defendants.
4. Rule 55(a) of Federal Rules of Civil Procedure provides:

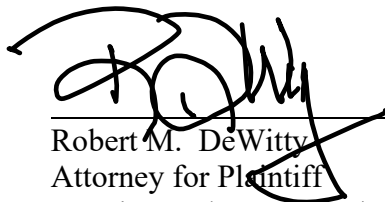
Entry. When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend as provided by these rules and that fact is made to appear by affidavit or otherwise, the clerk shall enter the party’s default.
5. Rule 12(a)(1)(A)(i) requires that a Defendant serve an answer “within 21 days after being served with the summons and complaint”.
6. It has been more than twenty-one (21) days since Defendants were serve with the

Summons and Complaint.

7. That Plaintiff requests that a Clerk's default be entered against the Defendants,
in accordance with FRCP 55(a).

DATED: December 3, 2024

Respectfully Submitted:

A handwritten signature in black ink, appearing to read 'R. M. DeWitty', is written over a horizontal line.

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